MANO A MANO, INC. WW3-123

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Ms Mariene H Dortch, Secretary, Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Public Comment on Video Relay Services for Spanish Speaking Individuals

Dear Ms Dortch,

The growing communication needs of the Hispanic-Deaf community have become more pressing than ever. Hispanic -Deaf in Spoken Spanish/English Communities, their families, interpreters, and other service providers are trying to make inroads culturally and linguistically to address the growth and changes within this unique and populous community

To that end, the not -for -profit organization, Mano a Mano (which means "hand in hand") was initially established in 1999, with the assistance of the National Multicultural Interpreting Project, to provide a national forum for the purpose of bringing together educational and professional development opportunities along with an interchange cultural and linguistic within the Hispanic/Latino community members. We have long been supporters individually and collectively of providing communication access through trilingual services in English, American Sign Language, and Spanish.

This year, the national conference was held at the Sheraton Hotel & Towers, in Chicago, Illinois, immediately before the opening of the Registry of Interpreters for the Deaf's National Convention. It was at this conference we learned that USAVRS will no longer provide Video Relay Service (VRS) between individuals who speak Spanish and individuals who use ASL, effective Tuesday, July 8th.

2003 As a group, we were stunned to hear of this sudden decision as this technology was just beginning to be used and understood within our Spanish speaking consumers.

It was further explained that the Federal Communications Commission (FCC) has previously deemed

Telecommunications Relay Service (TRS) calls, including VRS calls, made between two

different languages e.g., Spanish and English - to be translation services that go beyond the scope of TRS. Therefore, these services are not reimbursable to relay providers.

We discussed this matter collectively and unanimously passed a resolution to provide comments to the FCC regarding the urgent need to include these services as part of reimbursable communication access for Deaf, Hard of Hearing and Speech Impaired persons who come from Spanish speaking families and communities. There are two large populations directly affected.

First, our membership represents a sizeable deaf population in Puerto Rico that uses Spanish as the primary language of family, education, and business.

Second, the many communities interstate not limited to rapidly expanding Hispanic Deaf populations located in states such as Florida, Texas, New York, Illinois, New Mexico, Arizona, and California all include communities where Deaf persons who themselves are using ASL on video relay calls need communication access to communicate directly with family members, friends, businesses and other persons who are Spanish speaking.

The discontinuation of this service in effect severs communication access with Deaf children an their own parents via the video relay system. A common example of severed communication is of a Deaf child who must communicate with his/her parent who is only speaks only Spanish, another common use is between a Deaf spouse whose wife or husband is Spanish speaking.

The need and demand for multilingual skills for interpreters who know English, American Sign Language and Spanish has been growing rapidly since the 1980's when these needs were first identified and services begun. Our organization Mano A Mano was formed to assist our nation meet this multilingual communication demand.

We urge you to consider the impact of the discontinuation of multilingual services; and urge support of the immediate continuation of the reimbursement from the interstate relay fund for multilingual translation services to Deaf/hard or hearing persons who are from Spanish speaking families and communities. If you have further questions, please do not hesitate to contact me at

Very truly yours,

Angela Roth, Director Mano A Mano - An Organization of Sign Language Interpreters from Spanish Speaking Communities

CC: Tom Chandler, Chief
Consumer & Governmental Affairs Bureau
Disability Rights Office